

**UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**UNITED STATES OF AMERICA
Plaintiff,**

v.

**\$21,274.00 IN U.S. CURRENCY,
Defendant in rem.**

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CIVIL ACTION NO. 4:10-cv-02745

AMENDED VERIFIED CLAIM TO PROPERTY

Patron Seafood, Inc., rightful owner of the defendant in rem, hereby makes claim to the defendant \$21,274.00 in U.S. currency now held by the plaintiff. The defendant \$21,274.00 are funds derived from the sale of a shrimp fishing boat by Ranell, LLC (an entity owned by the claimant, Patron Seafood, Inc.) to an individual located in central America. The sale of the boat is evidenced by a Bill of Sale dated June 24, 2010, a true and correct copy of which is attached to this Amended Verified Claim to Property as Exhibit A.

The individual from whom the defendant in rem was seized, Mr. Richard Kalliainen is an employee of Ranell, LLC. Mr. Kalliainen was directed to deliver title to the boat to the buyer, then deliver the purchase price in U.S. currency to Ranell, LLC. Plaintiff alleges Mr. Kalliainen did not properly declare the defendant in rem when reentering the United States. It was at that time that the property was seized.

Respectfully Submitted by,



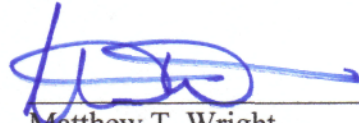
Matthew T. Wright
State Bar No. 24053563
Wright Law Group, PLLC
12620 FM 1960 Road West
Suite A-4, Box 304
Houston, TX 77065
(713) 454 – 9508 (Tel)
(866) 496 – 1006 (Fax)
ATTORNEYS FOR CLAIMANT,
PATRON SEAFOOD, INC.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Verified Claim to Property was served on the following accordance the Federal Rules of Civil Procedure, on this 15 day of September, 2010.

Via Regular Mail

Albert Ratliff
Assistant United States Attorney
P.O. Box 61129
Houston, Texas 77208-1129


Matthew T. Wright

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CIVIL ACTION NO. 4:10-cv-02745

AFFIDAVIT IN SUPPORT OF AMENDED VERIFIED CLAIM TO PROPERTY

THE STATE OF TEXAS §
 §
COUNTY OF BRAZORIA §

BEFORE ME, the undersigned authority, personally appeared George Gala, being by me duly sworn, deposed as follows:

1. “My name is George Gala. I am a resident of Brazoria County, Texas. I am over the age of eighteen (18), and have never been convicted of a felony or other crime of moral turpitude. I am of sound mind, capable of making this affidavit, and am personally acquainted with the true and correct facts herein stated or asserted:

2. I am the Vice President of Patron Seafood, Inc, which is the rightful owner of the defendant \$21,274.00 in U.S. currency now held by the plaintiff. The defendant \$21,274.00 are funds derived from the sale of a shrimp fishing boat by Ranell, LLC (an entity owned by the claimant, Patron Seafood, Inc.) to an individual located in central America.

3. The individual from whom the defendant in rem was seized, Mr. Richard Kalliainen is an employee of Ranell, LLC. Mr. Kalliainen was directed to deliver title to the boat to the buyer, then deliver the purchase price in U.S. currency to Ranell, LLC.

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4. I declare under penalty of perjury that I have read the Amended Verified Claim to Property, and the facts stated in the Claim are true and correct to the best of my knowledge and belief. "

Further affiant sayeth not.



George Gala
George Gala, Affiant

SIGNED and SWORN TO before me this the 15 day of September,
2010.

Barbara J. Groden
Notary Public in and for
State of ~~Texas~~ FL